

MICHAEL LEHNERS, ESQ.
429 Marsh Ave.
Reno, Nevada 89509
Nevada Bar Number 003331
(775) 786-1695
email michaellehners@yahoo.com
Attorney for Defendant
Frontier Financial Credit Union

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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MICHELLE M. BAYS

Plaintiff

vs.

FRONTIER FINANCIAL CREDIT
UNION, EXPERIAN INFORMATION
SOLUTIONS, Inc. and TRANS UNION,
LLC.

Defendants

Case No. 3:16-cv-656 -HDM-WGC
ORDER GRANTING
EMERGENCY EX-PARTE MOTION FOR
EXTENSION OF TIME TO FILE REPLY
BRIEF

_____/

COMES NOW Defendant, Frontier Financial Credit Union (FFCU), by and through undersigned counsel and files the following Emergency Ex-Parte Motion for Extension of Time to File its Reply Brief to the Plaintiff's Response to FFCU's Motion to Dismiss and to Stay. This motion is made and based upon the pleadings on file herein and the Memorandum of Points and Authorities attached hereto.

FFCU filed a motion to dismiss the Plaintiff's state law claims (ECF 22) and a motion to abstain under the Younger Abstention Doctrine (ECF 23). FFCU granted the Plaintiff an extension to file her opposition to these motions. The Plaintiff timely filed responses on January 2, 2017 to both motions (ECF 38 and 39). FFCU's reply is due January 9, 2017.

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FFCU is requesting a one week extension to file its replies based upon an emergency that is affecting its counsel. Mr. Lehnert rents a shop in the industrial area of Sparks. The shop is off of East Greg Street, near the railroad tracks. This area is in a flood zone. The weather service has predicted massive flooding of this area over the weekend. Mr. Lehnert had planned to research and draft replies over the weekend, but instead he has to move equipment and vehicles from the shop. He also has to sandbag the shop to prevent flood damage.

By his signature below, Mr. Lehnert certifies that this motion is not made for purposes of delay. Mr. Lehnert cannot reach counsel for the Credit Union, co-defendants, because they are on the east coast, and he has left a voicemail for plaintiff's counsel.

Dated: This 6th day of January, 2017

By: /s/ Michael Lehnert
Michael Lehnert, Esq.
429 Marsh Ave.
Reno, Nevada 89509
Nevada Bar Number 003331

IT IS SO ORDERED.

DATED: January 6, 2017



United States District Judge